



*2025 Fall National Meeting  
Hollywood, Florida*

## **PHARMACY BENEFIT MANAGEMENT (D) WORKING GROUP**

Tuesday, December 9, 2025

2:15 – 3:15 p.m.

### **Meeting Summary Report**

The Pharmacy Benefit Management (D) Working Group met Dec. 9, 2025. During this meeting, the Working Group:

1. Adopted its Summer National Meeting minutes.
2. Heard a presentation from Pharmacy Marketplace on a proposed automated pharmacy complaint tool it is developing to address issues related to the pharmacy complaint and appeal process.
3. Adopted the *Pharmacy Benefit Manager (PBM) Licensure and Regulation Guidelines for Regulators* document, including the revisions suggested by the Michigan Department of Insurance and Financial Services (DIFS) in its comment letter to the Working Group, and forwarded it to the Market Regulation and Consumer Affairs (D) Committee for its consideration. This action followed the Working Group's discussion of comments received by the Dec. 1 public comment deadline.
4. Discussed the draft PBM examination chapter, which the Working Group exposed on Nov. 25 for a public comment period ending Jan. 16, 2026. Following the end of the public comment period, the Working Group plans to meet in late January or early February to discuss the comments received and discuss next steps.
5. Received an update on the potential State Based Systems (SBS) changes to better handle PBM complaints.